

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

SEP 24 2024

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,

-) CRIMINAL NO. 24-1346 TB
-) Count 1: 18 U.S.C. § 1512(k): Conspiracy to Obstruct Justice;
-) Counts 2-3: 18 U.S.C. § 1512(c)(2): Obstruction of Justice; 18 U.S.C. § 2: Aiding and Abetting;
-) Counts 4-5: 18 U.S.C. § 1001: False Statement.

PAUL JESSEN, JR.,

Defendant.

INDICTMENT

The Grand Jury charges:

Count 1

Beginning on or about November 17, 2021, and continuing to on or about January 21, 2022, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL JESSEN, JR.**, knowingly, unlawfully, and willfully conspired, agreed, and acted interdependently with others known and unknown to the grand jury, to corruptly obstruct, influence, and impede, and did attempt to corruptly obstruct, influence, and impede an official proceeding, namely, a federal grand jury investigation, that would foreseeably result from an investigation conducted by the Drug Enforcement Administration of possible violations of federal criminal laws, in violation of 18 U.S.C. § 1512(c)(2).

All in violation of 18 U.S.C. § 1512(k).

Count 2

On or about November 23, 2021, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL JESSEN, JR.**, did knowingly, willfully, and corruptly obstruct, influence,

and impede, and did attempt to corruptly obstruct, influence, and impede an official proceeding, namely, a federal grand jury investigation, that would foreseeably result from an investigation conducted by the Drug Enforcement Administration of possible violations of federal criminal laws.

In violation of 18 U.S.C. § 1512(c)(2).

Count 3

On or about December 16, 2021, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL JESSEN, JR.**, did knowingly, willfully, and corruptly obstruct, influence, and impede, and did attempt to corruptly obstruct, influence, and impede an official proceeding, namely, a federal grand jury investigation, that would foreseeably result from an investigation conducted by the Drug Enforcement Administration of possible violations of federal criminal laws.

In violation of 18 U.S.C. § 1512(c)(2).

Count 4

On or about January 20, 2022, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL JESSEN, JR.**, in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency within the executive branch of the United States, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation, specifically that he had no personal knowledge that former Bernalillo County Deputy K.L. had obstructed the Drug Enforcement Administration's investigation of R.W., knowing such statement and representation to be false, fictitious, and fraudulent.

In violation of 18 U.S.C. § 1001.

Count 5

On or about March 22, 2022, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL JESSEN, JR.**, in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency within the executive branch of the United States, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation, specifically that **PAUL JESSEN, JR.** was not present for and did not hear the phone conversation between former Bernalillo County Deputy K.L. and drug trafficker R.W. on December 16, 2021, knowing such statement and representation to be false, fictitious, and fraudulent.

In violation of 18 U.S.C. § 1001.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

LEIGHA SIMONTON
UNITED STATES ATTORNEY



SEAN M. LONG

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Acting Under Authority Conferred by 28 U.S.C. § 515

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